



NW_Sage_Grouse, BLM_CO <blm_co_nw_sage_grouse@blm.gov>

Sagebrush protection towards boosting Greater Sage-grouse population

2 messages

Janice Shepherd <a.and.j.shepherd@gmail.com>

Thu, Nov 21, 2013 at 6:01 PM

To: blm_co_nw_sage_grouse@blm.gov

Cc: Petrika Peters <petrika@conservationco.org>

I have learned from scientists on the BLM Dominguez-Escalante Advisory Council that the value of patches 60 acres or larger of sagebrush that has never been previously bisected by a road is far greater from a biological and wildlife point of view than the equivalent sized area where mitigation has been done to remove a road. The mitigation is never as complete and equivalent as the original natural setting. Wildlife, especially Greater Sage-grouse thrives better in natural patches of sagebrush 60 acres or larger.

The D-E NCA Draft RMP contains the words "Allow for the construction of new routes in existing, unfragmented sagebrush shrublands, as long as one of the following conditions is met: - Any additional fragmentation of sagebrush shrublands is offset by projects that reduce fragmentation of sage parks elsewhere. ..."

The scientists on the Advisory Council have said that approach was not correct as the patched together area is not as healthy to wildlife as the original unfragmented area.

I am concerned therefore by the repeated use in the Draft LUPA/EIS of the metric of enforcing a 3% disturbance cap. A new road that bisects an unfragmented area may represent less than a 3% disturbance of the area but the very act of fragmentation has done the bad damage. Better that the needed road goes a long way around and avoids the area completely. Better still of course would be to reduce the number of needed roads by eliminating things such as oil and gas leases in the prime Greater Sage-grouse habitat and the areas surrounding that habitat.

It is still worthwhile to use mitigation to remove roads that bisect large areas of sagebrush.

I support at a minimum Alternative C for its protection of a larger number of acres in ROW exclusions and closure to mineral leasing.

I am particularly concerned about any allowance of coal mining under the Greater Sage-Grouse areas. Even if the mining is done with an NSO approach and angled underground mining is done problems can arise that result in surface disturbance. One only has to think of the Crandall Mine disaster where a tunnel was dug to reach the miners trapped in an area nowhere near the entrance of the mine. A huge swath of East Mountain was disturbed when they quickly built a road to get to the right location for the emergency tunnel drilling. I've hiked in that area. The road is a horrendous scar in an area with the densest variety of wildflowers I've ever seen (see attached photo IMG_7661 and that is just a small view of this amazing flowered area). There may well have been an NSO in affect, but the emergency rescue took precedence. So I don't believe that NSO protection is not a sufficient protection, better to disallow mineral leases (fluid and non-fluid) within the important Greater Sage-grouse areas.

Sincerely,
Janice Shepherd
Grand Junction, CO 81506



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NW_Sage_Grouse, BLM_CO <blm_co_nw_sage_grouse@blm.gov>
To: nwcoragegrouse_eis@empai.com

Fri, Nov 22, 2013 at 8:47 AM

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